

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: 11/24/2020
DATE FILED: 11/24/2020

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UNITED STATES OF AMERICA :

- v. - :

ANTHONY CHEEDIE, :
CHAD ALLEN, :
SHANE HANNA, :
CAMERON BREWSTER, :
KEVIN HANDREN, :
JOSEPH CIACCIO, :
a/k/a "Joseph Gallagher," :
JOSEPH MINETTO, :
JOSEPH DEPAOLA, :
a/k/a "Joe Hall," :
DERREK LARKIN, :
a/k/a "Derrek Martin," and :
MATTIE CIRILO, :
----- X

Defendants. :

WHEREAS, the United States of America seeks to provide
in unredacted form certain materials pursuant to Rule 16 of the
Federal Rules of Criminal Procedure; and

WHEREAS, certain materials that the Government seeks
to provide contain sensitive information, including personally
identifiable information related to specific individuals who are
not parties to this case; and

WHEREAS, the Government is willing, under the
conditions set forth below, to produce such materials;

IT IS HEREBY agreed, by and between the United States

of America, Geoffrey S. Berman, United States Attorney, by Kiersten A. Fletcher, Benet J. Kearney, and Robert B. Sobelman, Assistant United States Attorneys, and ANTHONY CHEEDIE, CHAD ALLEN, SHANE HANNA, CAMERON BREWSTER, KEVIN HANDREN, JOSEPH CIACCIO, a/k/a "Joseph Gallagher," JOSEPH MINETTO, JOSEPH DEPAOLA, a/k/a "Joe Hall," DERREK LARKIN, a/k/a "Derrek Martin," and MATTIE CIRILO, the defendants, by and through their undersigned attorneys, and Emma Greenwood, Esq., as Coordinating Discovery Attorney, that:

1. Any material reflecting sensitive identification information (including, but not limited to, names, addresses, dates of birth, Social Security numbers, driver's license information, telephone numbers, and personal private communications) produced by the Government in this action is deemed "Confidential Information" and shall be so identified by the Government.

2. Confidential Information disclosed to the defendants or to their counsel during the course of proceedings in this action:

(a) Shall be used by the defendants and their counsel only for purposes of the defense of this action;

(b) Shall be maintained in a safe and secure manner solely by the defendants and their counsel, and shall not

be disclosed in any form by the defendants or their counsel except as set forth in paragraph 2(c) below;

(c) May be disclosed by the defendants or their counsel only to the following persons (hereinafter "Designated Persons"):

(i) attorneys in practice with defense counsel of record, who are assisting the defendants' attorneys of record in this case;

(ii) investigative, secretarial, clerical, paralegal, or student personnel, or any interpreter or translator, employed full-time or part-time by the defendants' counsel;

(iii) independent expert witnesses, investigators, advisors, or third-party vendors retained by the defendants' counsel in connection with this action;

(iv) the court-appointed Coordinating Discovery Attorney ("CDA"), her staff, and any third-party vendors she retains;

(v) such other persons as hereafter may be authorized by the Court upon motion by the defendants; and

(d) Shall either be returned to the Government following the conclusion of the trial of the above-referenced action or upon the defendants' sentencing or upon the conclusion

of any appeals, or maintained by defendants' counsel as required by counsel's duties and responsibilities as counsel, as the case may be, provided that defendants' counsel maintain the Confidential Information in accordance with Paragraph 2(b).

3. The defendants and their counsel shall provide a copy of this Order to Designated Persons to whom they disclose Confidential Information pursuant to paragraph 2(c). Prior to disclosure of Confidential Information to Designated Persons, pursuant to paragraph 2(c), any such Designated Person shall agree to be subject to the terms of this Order by signing a copy hereof and providing such copy to the Government and the individual defendant's counsel. In addition, the CDA shall provide a copy of this Order to Designated Persons to whom she discloses Confidential Information pursuant to paragraph 2(c). Prior to disclosure of Confidential Information to Designated Persons, pursuant to paragraph 2(c), any such Designated Person shall agree to be subject to the terms of this Order by signing a copy hereof and providing such copy to the CDA.

4. The provisions of this Order shall not be construed as preventing the disclosure of any information in any motion, hearing, trial, or sentencing proceeding held in connection with the above-referenced action or to any District

Judge or Magistrate Judge of this Court for purposes of the above-referenced action.

5. With respect to Confidential Information, any filings with any court shall be governed by Rule 49.1 of the Federal Rules of Criminal Procedure.

6. The provisions of this order shall not terminate at the conclusion of this criminal prosecution and the Court will retain jurisdiction to enforce this Order following termination of the case.

GEOFFREY S. BERMAN
United States Attorney

By: 
Kiersten A. Fletcher
Benet J. Kearney
Robert B. Sobelman
Assistant United States Attorneys

Frederick L. Sosinsky, Esq.
Attorney for Anthony Cheedie

Jason E. Foy, Esq.
Attorney for Chad Allen

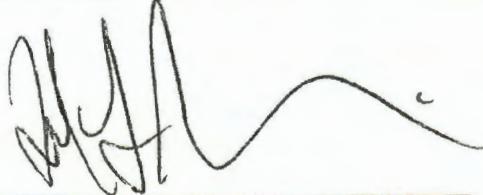
Judge or Magistrate Judge of this Court for purposes of the above-referenced action.

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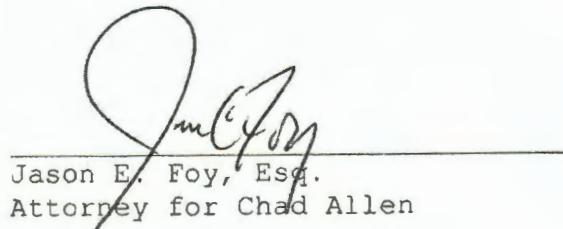
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GEOFFREY S. BERMAN
United States Attorney

By: _____
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Benet J. Kearney
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Assistant United States Attorneys



Frederick L. Sosinsky, Esq.
Attorney for Anthony Cheedie



Jason E. Foy, Esq.
Attorney for Chad Allen

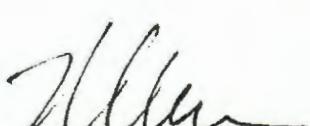


Richard H. Rosenberg, Esq.
Attorney for Shane Hanna

Ryan P. Pascable, Esq.
Attorney for Cameron Brewster

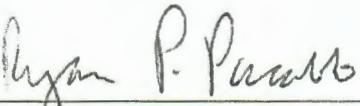
Samidh J. Guha, Esq.
Attorney for Kevin Handren

Tommy H. Vu, Esq.
Attorney for Joseph Ciaccio



Michael Sporn, Esq.
Attorney for Joseph Minetto

Richard H. Rosenberg, Esq.
Attorney for Shane Hanna



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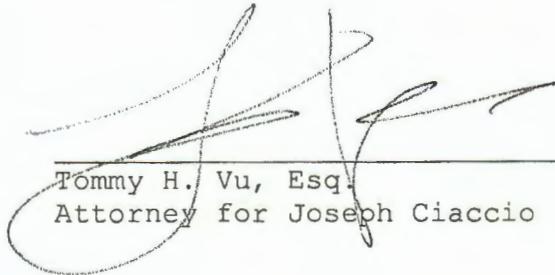
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Zachary Margulis-Ohnuma, Esq.
Attorney for Joseph Depaola



Brian J. Neary, Esq.
Attorney for Derrek Larkin

Mark I. Cohen, Esq.
Attorney for Mattie Cirilo



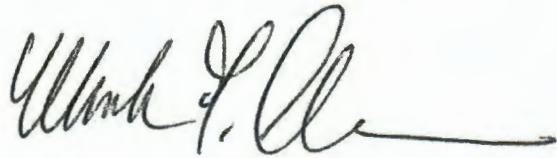
Emma Greenwood, Esq.
Coordinating Discovery Attorney

SO ORDERED:

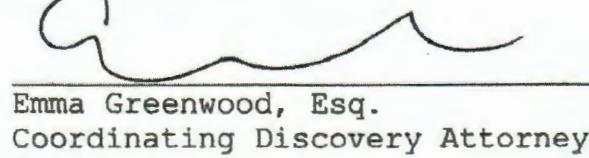
THE HONORABLE SIDNEY H. STEIN
UNITED STATES DISTRICT JUDGE

Zachary Margulis-Ohnuma, Esq.
Attorney for Joseph Depaola

Brian J. Neary, Esq.
Attorney for Derrek Larkin



Mark I. Cohen, Esq.
Attorney for Mattie Cirilo



Emma Greenwood, Esq.
Coordinating Discovery Attorney

The Protective Order may be modified for good cause shown
Jan 24, 2020 **SO ORDERED:**



THE HONORABLE SIDNEY H. STEIN
UNITED STATES DISTRICT JUDGE